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COMPLIANCE REPORTING FORM

- This form should be used to report all compliance-related information to the Financial Intelligence Unit (FIU) including information regarding suspected listed persons (Part B); assets you have frozen (Part C); and suspected breaches of financial sanctions (Part D).
- Please note that the information you provide may be shared for the purpose of facilitating or ensuring compliance with financial sanctions regulations, in accordance with the FIU's information sharing powers.
- Annexes B and C to this form provide key terms and information to assist you in completing your report.
- Your financial sanctions reporting and compliance obligations are described in the FIU's Guidance Documents. You should consult this guidance prior to completing this form. You should note that for some businesses there is a legal obligation to report, and that not doing so is an offence.
- Please ensure that when you complete this form, you believe that the facts and information provided in this form are accurate and true to the best of your knowledge.
- You should note that an offence may be committed if you contravene any of the prohibitions in respect of the financial sanctions regime(s) detailed in the Money Laundering and Terrorism (Prevention) Act, Cap. 104 ("the MLTPA") as amended by the Money Laundering and Terrorism (Prevention) (Amendment) Act, 2023, or if you intentionally participate in activities knowing that the object or effect of them is to circumvent any of those prohibitions or enables or facilitates the contravention of any of those prohibitions.
- Please email the completed forms, including any associated documents, to fiu.belize@fiubelize.org with "SUSPECTED LISTED PERSON", "FROZEN ASSETS", or "SUSPECTED BREACH" as applicable in the subject line.

- Alternatively, the completed forms can be posted or deliver to:
4998 Coney Drive Plaza
Coney Drive
Belize City, Belize
P.O. Box 2197

PART A: GENERAL INFORMATION

Please complete this part of the form and indicate what you are reporting on.

1. Person submitting this report	
Name (Including title)	
Job title	
Company / Organization	
Address	
Contact number(s)	
Email address	

2. Date submitted
(<i>dd/mm/yyyy</i>)

3. Are you submitting this form on behalf of a third party? Tick box	Yes	
		No
If yes, please provide the third party's contact details (including their Belize Permanent Reference Number and/or their UN Permanent Reference Number if they are a listed person)		

4. What are you reporting? Tick all applicable	
Suspected listed person [<i>please complete Part B of this form</i>]	
Frozen assets [<i>please complete Part C of this form</i>]	
Suspected breach [<i>please complete Part D of this form</i>]	

PART B: REPORTING A SUSPECTED LISTED PERSON

This part should be used to report your knowledge or suspicion that an individual, business or organisation is a listed person or is owned or controlled by a listed person or is acting on behalf of or at the direction of or in association with a listed person and is therefore subject to financial sanctions. Please complete a separate form for each individual, business or organisation on whom you are reporting.

Your report should include information by which such listed person can be identified, for example, aliases or alternative identities that could be used to evade sanctions.

If you are also reporting that you have frozen the assets of a listed person, please complete Part C of this form. If you are also reporting a suspected breach of financial sanctions, please complete Part D of this form.

5. Suspected listed person	
Belize Permanent Reference Number from the Belize Consolidated Sanctions List	
Name of the listed persons as given on the Belize Consolidated Sanctions List	
UN Permanent Reference Number from the UN Sanction List	
Name of the listed person as given on the UN Sanction List	

6. Person suspected to be owned/controlled or acting on behalf of/at the direction of/in association with a listed person	
Name of the person/entity	
Belize Permanent Reference Number of related listed person from the Belize Consolidated Sanctions List	
Name of related listed persons as given on the Belize Consolidated Sanctions List	

UN Permanent Reference Number of related listed person from the UN Sanction List	
Name of the related listed person as given on the UN Sanction List	

7. Information on which your knowledge or suspicion is based	
What has caused you to know or suspect that the individual, business or organisation you are reporting on is a listed person (or is owned/controlled or acting on behalf of/at the direction of/in association with one)?	<i>Please provide as much detail as possible, including your relationship with the person, what information you hold and how it came to you.</i>
Please provide any information not already on the Belize Consolidated Sanctions List by which the individual, business or organisation can be identified	<i>e.g. new aliases, dates of birth, addresses, passport numbers, additional trading names, etc.</i>

PART C: INFORMATION ON FROZEN ASSETS

This part should be used to report that you have frozen the assets of a listed person. Please complete a separate form for each listed person whose assets you have frozen. This includes freezing assets of an individual, business or organization that is owned or controlled by a listed person or is acting on behalf of or at the direction of a listed person.

If you know or suspect that a person is a listed person, please complete Part B of this form. If you are also reporting a breach of financial sanctions, please complete Part D of this form.

8. Suspected listed person	
Belize Permanent Reference Number from the Belize Consolidated Sanctions List	
Name of the listed persons as given on the Belize Consolidated Sanctions List	
UN Permanent Reference Number from the UN Sanction List	
Name of the listed person as given on the UN Sanction List	

9. Person suspected to be owned/controlled or acting on behalf of/at the direction of/in association with listed person	
Name of the person/entity	
Belize Permanent Reference Number of related listed person from the Belize Consolidated Sanctions List	
Name of related listed persons as given on the Belize Consolidated Sanctions List	
UN Permanent Reference Number of related listed person from the UN Sanction List	
Name of the related listed person as given on the UN Sanction List	

10(A). Please provide information on all funds and economic resources you have frozen (For definitions and guidance on what to include please see Annexes B & C.)

10(B). Please provide information on all other funds and economic resources which are subject to freezing but which are not under your control. (For definitions and guidance on what to include please see Annexes B & C.)

Part D: INFORMATION ABOUT A SUSPECTED BREACH

This part should be used to report any suspected or known breach of financial sanctions. Please complete one form for each overarching activity. Multiple transactions/transfers relating to an overarching activity may be listed in one form.

Your report should include all known details in relation to the suspected breach activity. Additional supporting material should be attached to your submission and noted in section 24. Where information is not known or not applicable, please state.

11. Who do you suspect has committed, or has attempted to commit, the suspected breach? Please provide details.

12. Summary of facts Including the date(s) the suspected breach (or breaches) was discovered, how it was discovered, and the series of actions that led to a suspected breach taking place (where known).

13. Does this information relate to a suspected completed, or suspected attempted, breach?

Tick box

Completed	
Attempted (<i>including blocked or rejected activity</i>)	

14. The Legislative Regime governing all financial sanctions in effect in Belize can be found in the most recent version of The Money Laundering and Terrorism (Prevention) Act, Cap. 104 (“the MLTPA”) as amended by the Money Laundering and Terrorism (Prevention) (Amendment) Act, 2023

Relevant section(s), of the MLTPA breached (if known) having been breached (if known)	

DETAILS OF SUSPECTED BREACH

See Annex B for a description of what can constitute property, funds, and financial services.

15. What does the suspected breach involve: Tick all applicable

Funds	
Describe, in full, the type(s) of funds involved.	
Property	
Describe, in full, the property(s) involved.	
Financial Services	
Describe, in full, what the financial services are, including how and when they were provided.	

Court Order¹ conditions	
Give the Court Order condition(s) and describe, in full, how you suspect it has been breached. Please include the Case Number of the Court Order	
Reporting obligations	
Give the reporting obligation and describe, in full, how you suspect it has been breached.	
Please include the Case Number of the Court Order where relevant.	

16. Total value of the suspected breach (actual or estimated)
Please provide this information in the currency that was used at the time of the transfer (or provide an estimated value in Belize Dollars if unknown).

17. Method(s) of payment and/or transfer
<i>e.g. bank transfer, cash, cheque, money order, internet/electronic, or physical asset transfer – road, air, sea, etc.</i>

¹ In this form, Court Order conditions refers to any exception to freezing obligations or prohibitions contained in an Order of the High Court made in accordance with MLTPA section 68(9).

18. Remitter/sender information

Please provide full information on the remitter/sender of the funds and/or property, including dates, goods involved, amount(s), currencies, account names, account numbers and sort codes, bank details, and nationalities of payers, dates of birth, where known.

If more space is required, please complete Annex 1 (A1), or attach supporting documents with your submission

19. Intermediary information

Please provide any information you have on intermediaries involved in the activity, including: role in transfer, name(s), date of birth, company registration information, country of operation/nationality, address/location, account name, account number and sort code and bank details, where known.

If more space is required, please complete Annex 1 (A2), or attach supporting documents with your submission.

20. Ultimate beneficiary information

Please provide information on the ultimate beneficiaries of the funds and/or economic resources, including: name, account name, account number and sort code, bank details, residential/company address, date of birth and nationality where known.

If more space is required, please complete Annex 1 (A3) or attach supporting document(s) with your submission

21. Please list all external parties who have been made aware that this information is being passed to the FIU, including listed persons.

22. Has this matter been reported to any other authority?

If so, please provide their contact details.

23. Other relevant information

Please provide any other information you think will help us understand what has happened.

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24. Are you providing any supporting documents?

Please include any documents that support the information provided, such as bank statements, transaction reports, copies of Court Orders, paperwork, contracts, etc. including those from other jurisdictions.

Yes

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No

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Please list the supporting documents you are providing

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Compliance Reporting Annex A

Additional remittances (for Section 16 Remitting information)

A1. Additional remittance information

Additional intermediaries involved (*for Section 17 Intermediary information*)

A2. Additional intermediaries

Additional beneficiaries involved (for Section 18 Ultimate beneficiary(ies) information)

A3. Additional beneficiaries

Compliance Reporting Form Annex B

This Annex describes some of the common terms used in MLTPA.

Listed Persons

“Listed person” means a person or entity declared to be a listed person in accordance with section 68 or listed in Part 1, 2, 3 or 4 of Schedule VIII of the MLTPA or a person or entity subject to a section 12 Notice pursuant to the MLTPA.

The FIU publishes on its website every Order obtained from the High Court under the Act, in respect of listed persons. This includes amendments to such Orders and revocations of such Orders. The list of listed persons can be found on the FIU website @ <https://fiubelize.org/belize-consolidated-sanctions-list>

Note that the financial sanctions also apply to persons and entities that are **owned or controlled**, directly or indirectly, by a listed person or are acting on behalf of, at the direction of or in association with a listed person. Those persons or entities may not be designated in their own right, so their name may not appear on the Belize Consolidated Sanctions List. However, those persons or entities are similarly the subject of the financial sanctions. For more information on ownership and control see the FIU’s Guidance Documents on Targeted Financial Sanctions.

Funds

“funds” means assets and benefits of every kind, whether corporeal or incorporeal, tangible or intangible, movable or immovable, however acquired, including, but not limited to–

- (a) cash, cheques, claims on money, drafts, money orders and other payment instruments;
- (b) deposits with relevant institutions or other entities, balances on accounts, debts and debt obligations;
- (c) publicly and privately traded securities and debt instruments, including stocks and shares, certificates representing securities, bonds, notes, warrants, debentures and derivatives contracts;
- (d) interest, dividends or other income on or value accruing from or generated by assets;
- (e) credit, rights of set-off, guarantees, performance bonds or other financial commitments;
- (f) letters of credit, bills of lading and bills of sale;
- (g) documents, in any form including electronic or digital, providing evidence of an interest in funds or financial resources; or
- (h) any other instrument of export financing, and legal documents or instruments in any form, including electronic or digital, evidencing title to, or interest in, such assets;

Property

“Property” means assets of every kind, whether corporeal or incorporeal, tangible or intangible, movable or immovable, however acquired, including, but not limited to, funds, financial assets, precious metals whether in a manufactured or unmanufactured state, precious stones whether in a treated or untreated state, economic resources including but not limited to oil and other natural resources and their refined products, modular refineries and related material, vehicles of every kind including but not limited to maritime vessels, legal documents or instruments in any form, including electronic or digital, evidencing title to, or interest in, such property, including, but not limited to, bank credits, payment cards, payment instruments, travellers cheques, bank cheques, money orders, shares, securities, bonds, drafts, or letters of credit, and any interest, dividends or other income on or value accruing from or generated by such property, and any other assets which potentially may be used to obtain property, goods or services, and includes a legal or equitable interest, whether full or partial, in any such property;”

Permanent Reference Number

All reports to the FIU involving listed persons should include their “Permanent Reference Number”. The Permanent Reference Number is a unique identifier for a listed persons which can be found in their entry on the [Consolidated Belize Sanctions List](#) as well as the original lists published by the United Nations Security Council (“UN Sanctions Lists”) where applicable.

These lists can be found at the following links:

https://www.un.org/securitycouncil/sanctions/1267/aq_sanctions_list/procedures-for-listing
https://www.un.org/securitycouncil/sanctions/1988/materials/procedures_listing
https://www.un.org/securitycouncil/sanctions/1718/materials/procedures_listing
<https://www.un.org/securitycouncil/content/2231/assets-freeze-exemptions>

Financial Services

“Financial services” includes carrying on the business of financial service provider, registered agents or managing services.

Compliance Reporting Form Annex C

Frozen accounts

All reports of frozen accounts should include the following information:

- Name of financial institution holding the account.
- Account name.
- Details of the account holder.
- Date account frozen.
- Type of account.
- Account number.
- Sort code (where relevant).
- Credit balance.
- Debit balance.
- Currency.
- Date account opened.
- Any other relevant information relevant to the freezing of the account.

Frozen payments / transactions

All reports of frozen payments or transactions should include the following information:

- Details of the institution/person who has frozen the transaction.
- Details of their role in the transaction.
- Date of transaction (Inc. amount and currency).
- Date transaction frozen.
- All relevant account details (originator, intermediaries, beneficiary).
- Details of the originator of the transaction (name, address, etc.).
- Details of the originating financial institution (name, address, etc.).
- Details of any intermediary financial institutions (name, address, etc.).
- Details of the beneficiary of the transaction (name, address, etc.).
- Details of the beneficiary financial institution (name, address, etc.).
- Any additional information found in the originator-to-beneficiary or bank-to-bank information.
- Any other additional information relevant to the freezing of the transaction, including the payment instruction where available.